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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO 00-6273-CR-HUCK/BROWN

UNITED STATES OF AMERICA,

PLAINTIFF,

v

ANTHONY TRENTACOSTA, et al ,

DEFENDANTS

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GOVERNMENT'S RESPONSE TO DEFENDANT HERNANDEZ'  
SECOND REQUEST FOR IMMEDIATE DISCLOSURE OF BRADY MATERIAL

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The United States of America, by and through the undersigned Assistant United States Attorney, hereby files its response to defendant Ariel Hernandez' second motion for Brady material <sup>1</sup>

In his Motion, the defense seeks information in the possession of the government which "tends to show that Co-Defendant, Anthony Trentacosta, has either completely or partially, severed his alleged ties with the Gambino Crime Family " Further, the defendant requests the production of "any and all information which suggests that Anthony Trentacosta is no longer an active member of the Gambino Crime Family, has entered retirement or semi-retirement, or has in any way modified

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<sup>1</sup>The defendant's motion was docketed on August 21, 2001, however, a service copy was never received by the undersigned. This may be due, at least in part, to the fact that the undersigned's address as stated on the certificate of service is incorrect. By notice herein, it is requested that all future pleadings be sent to the undersigned at 500 E Broward Blvd , Suite 700, Ft Lauderdale, Florida 33394




his relationship or level of activity with the Gambino Crime Family ” Such a request is over broad in that it seeks information which post-dates the indictment The government does not object to providing any such information as is applicable to the period of time preceding the return of the indictment on September 19, 2000 However, to the extent that the defendant seeks information concerning co-defendant Trentacosta’s activities since the return of the instant indictment, the government respectfully suggests that any such information is irrelevant and immaterial

WHEREFORE, the government respectfully requests that this Court deny the defendant’s second request for Brady material insofar as it seeks the production of matters concerning co-defendant Trentacosta’s post-indictment activities

Respectfully submitted,

GUY A LEWIS  
UNITED STATES ATTORNEY

By



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered by  
U S mail to the following on this 10<sup>th</sup> day of September 2001

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